

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

**CHARITY CHIDINMA
EMERONYE SWIFT,**

Plaintiff,

v.

**FRONTIER AIRLINES, INC.
(a Colorado corporation),
and JANE DOE,**

Defendants.

Civil Action No. 1:14-cv-1139

**Hon. Anthony J. Trenga
Hon. Magistrate Judge Ivan D. Davis**

DECLARATION OF CHARITY CHIDINMA EMERONYE SWIFT

I, Charity Chidinma Emeronye Swift, hereby declare as follows:

1. I am over the age of 18 years and competent to testify in this matter.
2. I have personal knowledge of the facts set forth in this Declaration.
3. I am the Plaintiff in the above-captioned case.
4. I offer this Declaration in support of my Motion to Extend Time for Objecting to Defendant's Interrogatories and Requests for Production.
5. I initially filed this case *pro se*. I then was represented by Douglas M. Coleman, Esq., who withdrew after a few weeks, leaving me again *pro se*, until Stephen Christopher Swift became my attorney in this case. Mr. Coleman obtained a continuance for me to obtain other counsel when he withdrew. I spent a lot of time trying to find a new attorney, but could not, and at the last minute, had to ask my husband to represent me. I have always been willing to grant

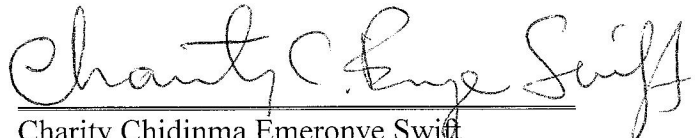
at the last minute, had to ask my husband to represent me. I have always been willing to grant continuances to counsel for Frontier Airlines when they wanted them.

6. Between December 18, 2014 and January 5, 2015, Paula Wegman, counsel for Frontier Airlines, called my counsel, and with his permission spoke to me, and asked if I wanted to talk then on the telephone, prior to the hearing on my motion for leave of court to file an amended complaint, or afterwards. I told her that after the hearing, if she still wanted to talk to me, that would be fine. Based on this, I believed that the case would be settled, and I was distracted by the Christmas and New Year holidays.

7. I consider interrogatories requesting private information, such as my Social Security Number, Drivers License Number, age and residential address, to be an invasion of my privacy, that serve no purpose but to oppress me.

8. I declare under penalty of perjury that the foregoing is true and correct.

Dated: February 3, 2015


Charity Chidinma Emeronye Swift
Plaintiff